

1 Pursuant to Civil Local Rule 6-1, plaintiff Ludmila Gulkarov (“Plaintiff”) and defendant
2 Plum, PBC (“Plum”) (collectively, the “Parties”), by and through their respective counsel of
3 record, hereby stipulate as follows:

4 WHEREAS, on February 5, 2021, Plaintiff filed their initial complaint in this matter
5 (ECF No. 1);

6 WHEREAS, on February 12, 2021, Plaintiff served Plum with summons and complaint;

7 WHEREAS, based on the February 12, 2021 service, the last day for Plum to respond to
8 the complaint is March 5, 2021;

9 WHEREAS, the Parties have met and conferred and have agreed to extend the deadline
10 by which Plum must respond to the complaint by thirty-one (31) days, such that Plum’s response
11 will be due on or before April 5, 2021; and

12 WHEREAS, the Parties have not previously sought an extension to the time to respond to
13 the complaint; and

14 WHEREAS, the response date to which the Parties have stipulated will not impact any
15 previously scheduled dates in this matter;

16 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
17 the Parties and through their respective counsel, subject to approval from the Court, that Plum
18 shall respond to the complaint by April 5, 2021.

19 Dated: March 1, 2021

MAYER BROWN LLP

20 Dale J. Giali

21 Keri E. Borders

Rebecca B. Johns

22 DECHERT LLP

23 Hope Friewald

Mark Cheffo

Christina Sarchio

24 by: /s/ Dale J. Giali

25 Dale J. Giali

26 Attorneys for Defendant

PLUM, PBC

1 Dated: March 1, 2021

LOCKRIDGE GRINDAL NAUEN P.L.L.P.
2 Robert K. Shelquist
Rebecca A. Peterson

3 LITE DEPALMA GREENBERG, LLC
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6 Charles Laduca
Katherine Van Dyck
C. William Frick

7
8 by: /s/ Rebecca A. Peterson
9 Rebecca A. Peterson
Attorneys for Plaintiffs
10 LUDMILA GULKAROV

11 **ATTESTATION**

12 I, Dale J. Giali, hereby attest, pursuant to Civil Local Rule 5-1(i)(3), that concurrence in
13 the filing of this document has been obtained from each signatory.

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15 by: /s/ Dale J. Giali
Dale J. Giali

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